REMARKS

Claims 1-19 are pending, each of independent claims 1, 9 and 12 having been amended to recite the different low-pass filters that are selectively applied to low- and high-activity blocks, respectively. Each of claims 5, 11 and 16 has been amended to conform with the amendment made to its independent claim. Reconsideration is respectfully requested in light of the amendments and remarks made herein.

Initially, applicant points out that the specification has been amended to make reference to the priority claim made previously in the Declaration, Application Transmittal, and Data Entry Sheet.

Turning now to the art rejections, claims 1-5 and 9-16 have been rejected under 35 U.S.C § 103(a) based on European Patent Application 0 585 573 A2 to *De Garido et al.* (*De Garido*) in view of US Patent No. 5,229,864 to *Moronaga et al.* (*Moronaga*).

De Garido's method of suppressing blocking artifacts differs in several respects from applicant's claimed invention. In *De Garido's* method, activity is measured for a given block based on a 3 × 3 array of DC coefficients, one from the block under consideration and the remainder from its eight surrounding nearest neighbor blocks. In contrast, in applicant's invention, as set forth in each of independent claims 1, 9 and 12, the classification of a particular pixel block is based on the predicted AC coefficients for that block. In fact, *De Garido's* method does not even predict AC coefficients for blocks determined to be of high activity, and suggests not doing this. *De Garido*, p. 5, lines 14-19. Applicant's claimed invention, on the other hand, predicts a select number of lower frequency coefficients for each pixel block, after which the classification is based on the predicted AC coefficients (see, e.g., claim 1, steps (c) and (d)). *De Garido* also fails to disclose applying any blocking correction to high-activity blocks. In fact, *De Garido* expressly teaches against this: "If the results of the testing indicate that the region being tested is varying rapidly in intensity, then no blocking correction is applied . . ." *De Garido*, p. 4, lines 5-6. Compare this with applicant's invention, as set forth in each of the independent claims, which now

recites that high-activity blocks are candidates for receiving low-pass filtering of a second strength; whether a certain region in such a block is low-pass filtered depends on whether a minimum condition for that region is satisfied.

The secondary reference, *Moronaga*, does not offset these deficiencies in *De Garido*. Accordingly, applicant respectfully submits that each of claims 1, 9 and 12 is patentable over the combination of *De Garido* and *Moronaga*. It is further submitted that each of independent claims 2-5, 10, 11 and 13-16 is patentable for at least the same reasons as is its corresponding independent claim.

Applicant acknowledges with appreciation the Examiner's indication that each of claims 6-8 and 17-19 contain allowable subject matter, and submit that, in view of the amendments and remarks present herein, they too are now allowable as is.

In view of the foregoing, applicant respectfully requests favorable reconsideration of the present application.

Respectfully submitted,

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